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Counsel for Tradewinds Towing, LLC

## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

Tradewinds Towing, LLC,

Plaintiff,

v.

Schuyler Line Navigation Company, LLC,

Defendant,

and

Oceanfirst Bank, National Association

Garnishee.

Civil Action No.

**IN ADMIRALTY** 

NOTICE OF MOTION FOR ATTACHMENT AND **GARNISHMENTAND APPOINTMENT** FOR SERVICE OF PROCESS

Filed Electronically

Plaintiff Tradewinds Towing, LLC ("Tradewinds") moves, pursuant to Supplemental Rule B for the issue of Process of Maritime Attachment and Garnishment ("Writs") for property of Defendant brings this action against Schuyler Line Navigation Co. ("Schuyler") held or controlled by Garnishee or its agents located in this District, and for an Order appointing Marc D. Haefner or any other qualified person appointed by him, to serve process of maritime garnishment, and any supplemental process in this matter.

Supplemental Rule B(1)(d)(ii) provides in pertinent part as follows:

If the property is other tangible or intangible property, the summons, process, and any supplemental process must be delivered to a person or organization authorized to serve it, who may be (A) a marshal; (B) someone under contract with the United States; (C) **someone specially appointed by the court for that purpose**; or, (D) in an action brought by the United States, any officer or employee of the United States.

(Emphasis added).

As further grounds for this motion, Plaintiff states that service of the maritime garnishment writs issued in this case will be straightforward, on garnishees located in this District. Utilizing private process service will conserve the resources of the United States Marshal.

Plaintiff will, upon service, promptly cause returns of service to be filed in this case.

WHEREFORE, Plaintiff respectfully requests this Court to grant this motion and herewith submits a draft order.

Dated: September 20, 2024

## WALSH PIZZI O'REILLY FALANGA LLP

/s/ Marc D. Haefner

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